



STATE OF ALASKA
DEPARTMENT OF
COMMERCE
COMMUNITY AND
ECONOMIC DEVELOPMENT

Mike Dunleavy, Governor
Julie Anderson, Commissioner
Robert M. Pickett, Chairman

Regulatory Commission of Alaska

April 7, 2021

File: TA527-18

LO#: L2100083

Dissenting Statement of Commissioner Antony G. Scott,
Joined by Commissioner Janis W. Wilson

MEA rightly points out that 3 AAC 50.910(b), read in isolation, places a minimum threshold on the amount of net metering capacity that MEA must interconnect and accept. MEA asserts that because they choose to accept a greater amount of net metering than this they are under no obligation to take advantage of the provisions of 3 AAC 50.910(e), which allows them to raise their net metering capacity threshold. Instead, MEA intends to monitor the ability of their system to contend with increased amounts of net metering capacity, without providing information to their members as to whether they might reasonably expect to be granted permission to interconnect.

Although MEA's reading is logical, I do not believe that it is appropriate given the full context of provisions of 3 AAC 50.910(b) and (e), taken together. A number of utilities have availed themselves of the provisions of 3 AAC 50.910(e) and asked for an increase in the 3 AAC 50.910(b) limits. They have done so, presumably, because they seek to provide information that their members can use. Small scale solar or wind installations are not small investments for many home owners and small businesses. Even beginning the planning process is not a minor undertaking. The purpose of 3 AAC 50.910(e) is for electric utilities to provide a clear and transparent investment climate for their customers. A more holistic reading of all of the provisions of 3 AAC 50.910 leads me to dissent from the decision to accept MEA's revised filing.

I would have required MEA to seek an increase in their net metering capacity threshold, using the provisions as 3 AAC 50.910(e). The filed tariff – which provides transparent and relatively easy to find information for customers – should be available to help provide clear expectations for all of its customers. Nothing prevents MEA from increasing this threshold gradually. This commission has summarily granted every such request it has received. Complying with the regulatory burden associated with this more holistic reading of 3 AAC 50.910 is slight, and justified by the increase in transparency for MEA's customers.

Sincerely,

REGULATORY COMMISSION OF ALASKA

Antony Scott

Antony Scott (Apr 7, 2021 16:17 AKDT)

Antony G. Scott

Commissioner

Janis W. Wilson

Janis W. Wilson (Apr 7, 2021 16:55 AKDT)

Janis W. Wilson

Commissioner